

**Re: NS obo WF v Sturgis - stip/order to seal**

**LP**

Lindsay P. Hazen <lhazen@gmhlaw.com>

Thu, 12 Dec 2024 1:39:59 PM -0500 •

To "Liz Abdnour" <liz@education-rights.com>

Cc "Ken B. Chapie" <kchapie@gmhlaw.com>, "Tim Mullins" <tmullins@gmhlaw.com>, "Jacquelyn Kmetz" <jacquelyn@education-rights.com>

You can sign my name to the amended stip with additional documents from the administrative record.

We do not consent to a motion to strike.

**Lindsay P. Hazen**

Giarmarco, Mullins & Horton, P.C.

Tenth Floor Columbia Center

101 West Big Beaver Road

Troy, Michigan 48084-5280

Phone: (248) 457-7047

Fax: (248) 404-6336

Email: [lhazen@gmhlaw.com](mailto:lhazen@gmhlaw.com)

[www.gmhlaw.com](http://www.gmhlaw.com)

\*Confidential: This electronic message and all contents contain information from the law firm of Giarmarco, Mullins & Horton, P.C., which may be privileged, confidential, or otherwise protected from disclosure. Any recipient other than the intended recipient is hereby notified that any disclosure, copy, distribution, or use of the contents of this message or any attachments is strictly prohibited. If you have received this electronic message in error, please notify us immediately by reply e-mail or phone and destroy the original message, attachments, and all copies.\*

---

**From:** Liz Abdnour <[liz@education-rights.com](mailto:liz@education-rights.com)>

**Sent:** Thursday, December 12, 2024 1:16:23 PM

**To:** Lindsay P. Hazen <[lhazen@gmhlaw.com](mailto:lhazen@gmhlaw.com)>

**Cc:** Ken B. Chapie <[kchapie@gmhlaw.com](mailto:kchapie@gmhlaw.com)>; Tim Mullins <[tmullins@gmhlaw.com](mailto:tmullins@gmhlaw.com)>; Jacquelyn Kmetz <[jacquelyn@education-rights.com](mailto:jacquelyn@education-rights.com)>

**Subject:** Re: NS obo WF v Sturgis - stip/order to seal

Hi all,

I am writing to follow up on this, as well as two other things.

First, if you do not agree to sign this stip and order, do you consent to us filing a motion to file the administrative record with the additional missing documents?

Second, we are planning to file a motion to strike the MSJ brief for failure to comply with Fed. R. Civ. P. 7.1(b)(1) and 56 and LCivR 7.1(a). Please let us know if you consent. Thanks.